

Attorney Declaration of Lyle D. Rowen
Case No. 23-cv-3652 (VSB)(SLC)

EXHIBIT D



GRIEVANCE INITIATION LETTER

9/15/2021

SERVICE EMPLOYEES
INTERNATIONAL UNION
CTW, CLC

KYLE BRAGG
President

MANNY PASTREICH
Secretary Treasurer

LENORE FRIEDLAENDER
Assistant to the President

VICE PRESIDENTS
SHIRLEY ALDEBOL
KEVIN BROWN
JAIME CONTRERAS
DEAN DEVITA
ROB HILL
DENIS JOHNSTON
GABE MORGAN
ROCHELLE PALACHE
ROXANA RIVERA
JOHN SANTOS
CANDIS TOLLIVER

Capital Area District
Washington 202.387.3211
Baltimore 410.244.6299
Virginia 202.387.3211

Connecticut District
Hartford 860.560.8674
Stamford 203.674.9965

District 1201
215.923.5488

Florida District
305.672.7071

Hudson Valley District
914.328.3492

Mld-Atlantic District
215.226.3600

National Conference of
Firemen and Oilers
606.324.3445

New England District 615
617.523.6150

New Jersey District
973.824.3225

Western Pennsylvania District
412.471.0690

www.seiu32bj.org

Barbara Barolli
Realty Advisory Board on Labor Relations
1 Penn Plaza, 21st Floor
New York, NY 10119

Work Location: 350 West 53rd Street
Member: Jon Chaney
Case# 87299-21

To Whom It May Concern:

SEIU Local 32BJ and the Employer at the above-referenced work location are signatory to a collective bargaining agreement which provides that in the event of disputes, the matter shall be referred to the Joint Industry Grievance Committee ("JIGC"). Local 32BJ submits the following dispute(s) to the JIGC, which the Employer has refused to adjust:

Claim	Issue
Termination	Member states that he was unjustly discharged effective 09/01/2021
Vacation Accrued After Termination	Member claims he is owed accrued vacation pay.
Race	Member claims that they are being discriminated against on the basis of their race.

The
Employer in
this matter

is:

LUMIERE CONDOMINIUM c/o
AKAM ASSOCIATES, INC.
260 MADISON AVE FL 12
NEW YORK, NY 10016

Please schedule this matter for a JIGC hearing as soon as practicable. Thank you for your anticipated cooperation.



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Very Truly Yours,

A handwritten signature in black ink, appearing to read "A. Skorupa".

Anna Skorupa

cc:

Jon Chaney

AKAM ASSOCIATES, INC.

Gene Szymanski, Grievance Representative, 32BJ SEIU